

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 20 B 11230  
Anthony Crocilla and Melissa Crocilla, ) HON. Janet S. Baer  
 )  
DEBTORS. ) CHAPTER 13

**NOTICE OF MOTION**

TO: Glenn B Stearns, 801 Warrenville Road, Suite 650, Lisle, IL 60532;

See Attached Service List

PLEASE TAKE NOTICE that on July 9, 2021, at 9:30 A.M., I will appear before the HONORABLE Janet S. Baer or before any judge sitting in that judge's place, and present the attached Motion to Modify Plan, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 160 731 2971 and the password is 587656. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on June 8, 2021.

---

*/s/ Yisroel Moskovits*

Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

0752-1

Case 20-11230

Northern District of Illinois

Eastern Division

Tue Jun 8 13:53:32 CDT 2021

ARRONRNTS

309 E PACES FERRY

ATLANTA, GA 30305-2377

Bank of America

PO Box 790087

Saint Louis, MO 63179-0087

Brandon S. Lefkowitz

29777 Telegraph Road, Suite 2440

Southfield, MI 48034-7667

CB/VICSCRT

220 W SCHROCK RD

WESTERVILLE, OH 43081-2873

CITIZENS FIN

1477 LOCUST ST

DUBUQUE, IA 52001-4715

Capital One Bank

PO Box 85617

Richmond, VA 23285-5617

Capital One, N.A.

c/o Becket and Lee LLP

PO Box 3001

Malvern PA 19355-0701

City of Chicago Department of Finance

c/o Arnold Scott Harris P.C.

111 W Jackson Blvd Ste 600

Chicago, IL 60604-3517

Dupage County Clerk

421 N County Farm Rd

Wheaton, IL 60187-3992

FIRST MERIT BANK

295 FIRST MERIT CIRCLE

AKRON, OH 44307-2305

FORD MOTOR CREDIT COMP

PO BOX BOX 542000

OMAHA, NE 68154-8000

(p) FORD MOTOR CREDIT COMPANY

P O BOX 62180

COLORADO SPRINGS CO 80962-2180

HNTINGTN NTL

7450 HUNTINGTON PA

COLUMBUS, OH 43235-5617

(p) INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

IRS

P.O. Box 7346

Philadelphia Pennsylvania 19101-7346

(p) ILLINOIS DEPARTMENT OF REVENUE

BANKRUPTCY UNIT

PO BOX 19035

SPRINGFIELD IL 62794-9035

Illinois Department of Employment Security

PO Box 4385

Chicago, IL 60680-4385

Illinois Tollway

2700 Ogden Ave

Legal Dept

Downers Grove, IL 60515-1703

Internal Revenue Service

P.O. Box 7346

Philadelphia Pennsylvania 19101-7346

KOHLS/CAPONE

N56 RIDGEWOOD DR

MENOMONEE FAL, WI 53051

Kohls/Capone

N56 W 17000 RIDGEWOOD DR

MENOMONEE FALLS Wisconsin 53051-7096

Midland Credit Management, Inc.

PO Box 2037

Warren, MI 48090-2037

Opp Loans

11 E. Adams St. #501

Chicago, IL 60603-6333

Opportunity Financial, LLC

130 E. Randolph Street

Suite 3400

Chicago, IL 60601-6379

TIDEWATER CREDIT SERVI

6520 INDIAN RIVER RD

VIRGINIA BEACH, VA 23464-3439

The Huntington National Bank

P O Box 89424

Cleveland OH 44101-6424

The Illinois Tollway

PO Box 5544

Chicago, IL 60680-5491

Case 20-11230 Doc 59 Filed 06/08/21 Entered 06/08/21 14:30:12 Desc Main Document Page 4 of 6

Unifund CCR, LLC  
Resurgence Legal Group, PC  
3000 Lakeside Drive, Suite 309-S  
Bannockburn, IL 60015-1249

Anthony Crocilla  
320 North Rush Street  
Itasca, IL 60143-1844

Charles E Murphy  
The Semrad law Firm, LLC  
20 S. Clark 28th Floor  
Chicago, IL 60603-1811

Glenn B Stearns  
801 Warrenville Road Suite 650  
Lisle, IL 60532-4350

Melissa Crocilla  
320 N. Rush St  
Itasca, IL 60143-1844

Patrick Semrad  
The Semrad Law Firm, LLC  
20 S. Clark St, 28th Floor  
Chicago, IL 60603-1811

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Yisroel Y Moskovits  
The Semrad Law Firm, LLC  
20 S. Clark St.  
28th Floor  
Chicago, IL 60603-1811

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

FORD MOTOR CREDIT COMPANY LLC  
PO Box 62180  
Colorado Springs, CO 80962

IRS  
Irs Mail Stop 4100 P-3  
Kansas City, MO 64999

Idor-Bankruptcy Section  
P.O. Box 19035  
C/O Bankruptcy Unit  
Springfield Illinois 62794

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) FORD MOTOR CREDIT COMPANY LLC

End of Label Matrix	
Mailable recipients	37
Bypassed recipients	1
Total	38

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 20 B 11230  
Anthony Crocilla and Melissa Crocilla, ) HON. Janet S. Baer  
DEBTORS ) CHAPTER 13

**MOTION TO MODIFY PLAN**

NOW COMES, Anthony Crocilla and Melissa Crocilla, Debtors, by and through Debtors' attorney, The Semrad Law Firm, LLC, moves this Honorable Court to enter an Order Modifying Debtors' Chapter 13 Plan of Reorganization as set forth below, and in support thereof states as follows:

1. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. Debtors filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on June 4, 2021.
3. This Honorable Court has yet confirmed the instant case on December 18, 2020.
4. That the confirmed Chapter 13 Plan requires the Debtors to make plan payments to the Chapter 13 Trustee in the amount of \$510.00 on a monthly basis for a term of 15 months and \$830.00 per month for 21 months.
5. That the Debtors' confirmed Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors to be paid 10% of their allowed claims.
6. Debtors fell behind on plan payments because he took a leave of absence from work to help care for his wife, the Co-Debtor, who is dealing with a serious medical condition, and when he tried to return, they didn't have enough work for him.

7. Debtors fell behind on their necessary household expenses and further down on their Trustee payments. That as a result, Debtors accrued a plan payment delinquency.
8. Debtor is now employed elsewhere. Please see Exhibit A.
9. Debtors are able to continue making the Trustee payments, if the default is deferred.
10. Debtors respectfully request this Honorable Court to defer the current plan default to the end of the plan of reorganization.
11. Debtors are in a position to continue with their Chapter 13 Plan of reorganization.
12. That the Debtors have every good faith intention of completing the Chapter 13 Plan of reorganization.

WHEREFORE, Anthony Crocilla and Melissa Crocilla , Debtors, respectfully request this Honorable Court enter an Order Modifying the Debtor's Chapter 13 Plan:

- (a) To defer the current Chapter 13 Plan default to the end of the plan of reorganization;
- (b) For such other and further relief as this Court deems fair and just.

Respectfully Submitted,

/s/ Yisroel Moskovits  
Attorney for the Debtor  
The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625